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MEMO ENDORSED

October 15, 2021

10/19/21

BY ECF

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Joseph Bailey
19 Cr. 412 (CM)

the Government having no
objection to the release of
Mr. Bailey's passport, the Court
directs that Pre-trial Services
release his passport.

Colleen McMahon

Dear Judge McMahon:

We represent the defendant, Joseph Bailey, in the above-captioned matter and write to request that the Court direct the Pre-Trial Services Office ("Pre-Trial Services") to release Mr. Bailey's passport to his family. We are advised by Assistant United States Attorney Dina McLeod that the Government has no objection to this request.

As the Court is aware, an order was entered by the Court setting the conditions of Mr. Bailey's pre-trial release, including the condition that he surrender his passport to Pre-Trial Services. Mr. Bailey complied with that condition. On December 22, 2020, Mr. Bailey was sentenced to six months incarceration and a period of three years supervised release. Mr. Bailey surrendered to the custody of the Bureau of Prisons ("BOP") on October 7, 2021 to serve his sentence.

Mr. Bailey's passport remains in the custody of Pre-Trial Services, which has advised that an order of the Court is required before it may release Mr. Bailey's passport. Otherwise, the passport will be sent to the U.S. State Department and Mr. Bailey would then be required to re-apply for a new passport document.

For the forgoing reasons, Mr. Bailey respectfully requests that the Court direct that Pre-Trial Services release Mr. Bailey's passport.

USDC SDNY
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Respectfully submitted,



Michael Sardar

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(By ECF)